



Winston H. Hickox
Secretary for
Environmental
Protection

California Regional Water Quality Control Board

Los Angeles Region

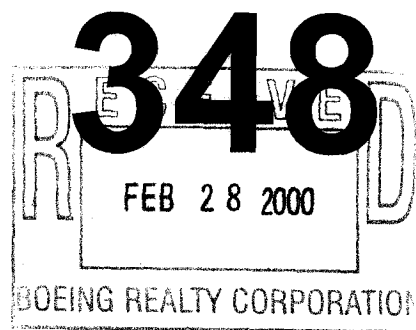
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Gray Davis
Governor

February 25, 2000

Mr. Mario Stavale
Boeing Realty Corporation
4060 Lakewood Blvd., 6th Floor
Long Beach, California 90808-1700



PARCEL D SITE INVESTIGATION AND EXCAVATION REPORT, BOEING REALTY CORPORATION (BRC) C-6 FACILITY, LOS ANGELES (FILE NO. 100.315) (SLIC No. 410)

Dear Mr. Stavale:

Reference is made to the October 1999 report that Integrated Environmental Services, Inc. (ESI) prepared and submitted on your behalf for the above-referenced Parcel. The report presents a summary of the investigation and the analytical result of soil sampling conducted.

Arsenic was detected in a soil sample collected from boring (B-3) at a concentration of 18 mg/kg during the initial soil sampling. However, other analytical results of soil samples collected during the investigation indicated that no other contaminants exceeded your recommended health based remediation goals (HBRGs). For purposes of delineation, you defined arsenic impacted soil as soil containing total arsenic at concentrations above 14 mg/kg. Due to the elevated level of arsenic found in boring B-3 you conducted further lateral and vertical delineation soil sampling. While conducting the delineation soil sampling, up to 840 mg/kg of arsenic was detected in a soil sample. Subsequently, you excavated the upper 1.5 feet of soil in an area measuring approximately 400 by 300 feet. In other areas where you observed arsenic impact in soil below 1.5 feet, you conducted further isolated deeper excavation. Approximately 8,242 cubic yards of impacted soil from the excavations were disposed of off-site at appropriate landfill locations.

The following are our comments on the above-referenced *Parcel D Site Investigation and Excavation Report*.

1. It appears that you have fully investigated and remediated arsenic impacted soil in Parcel D to the HBRGs and in accordance with the work plan that was approved for the project. As you are aware, the HBRG of 14 mg/kg for arsenic is above the US EPA preliminary remediation goal of 2.7 mg/kg for industrial soil. It is our understanding that you are covering the entire site with up to 2 feet of clean fill material. In addition, you propose to address any potential remaining health issues in Parcel D in the health-risk assessment study that you are preparing.
2. Groundwater occurs at a depth of approximately 65 feet below the site. Soil samples were collected from a maximum depth of 15 feet during the investigation. Because of the large area that was remediated and the high concentration of arsenic in the remediated soil, groundwater investigation is necessary in Parcel D. We are requiring groundwater investigation to determine if arsenic or other potential pollutants have impacted groundwater, and to determine if the residual concentration of arsenic remaining in soil poses a threat to groundwater quality.

California Environmental Protection Agency



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3. By **April 25, 2000**, we require that you submit a work plan to sample groundwater in Parcel D to address the area where arsenic was partially remediated in soil.

If you have any questions, please contact me at (213) 576-6812.

Sincerely,



Augustine E. Anijelo, P.E.
Associate Water Resources Control Engineer

cc: Michael Y. Young -- Integrated Environmental Services, Inc.
Debora Oudiz -- Cal EPA - DTSC, Cypress

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